

To: Albright, David[Albright.David@epa.gov]
From: Rao, Kate
Sent: Mon 5/22/2017 3:51:50 PM
Subject: FW: Summary of Notes on Call with Nancy Rumrill and Shari Ring on May17

FYI -

Kate Rao
Drinking Water Protection Section (WTR 3-2)
USEPA Region 9
75 Hawthorne St., San Francisco, CA 94105
tel: (415) 972-3533 / fax: (415) 947-3549

From: JAMES D WALKER [mailto:jameswalker5@msn.com]
Sent: Saturday, May 20, 2017 1:38 PM
To: Rao, Kate <Rao.kate@epa.gov>
Cc: Rumrill, Nancy <Rumrill.Nancy@epa.gov>; Shari.Ring@cadmusgroup.com
Subject: Summary of Notes on Call with Nancy Rumrill and Shari Ring on May17

Hi Kate,

The purpose of the call was to discuss the scope of the tasks for Cadmus to draft the Record of Decision (ROD) for the proposed aquifer exemption (AE) and the Class III UIC permit for the Gunnison ISR Copper Project.

AE ROD discussion:

Cadmus should follow the EPA guidance outlined in the P. Grematt memorandum dated July 24 , 2014 and the AE checklist for drafting the ROD. The draft permit should be referenced for background information in the proposed AE. It will be considered a non-substantial AE and will not require public participation separate from the draft permit. The closest drinking water wells to the AE boundary should be identified in the ROD. The ROD should appear like a condensed version of the recent aquifer exemption RODs approved for Class II injection wells in California. Use the AE checklist as a starting point and guide for the format of the ROD.

Documentation for the basis of the ROD should be included in the draft permit. Refer to responses to comments for the most recent information related to the AE.

The revised application is due from Excelsior in two to three weeks. The draft ROD is due to EPA by May 24, but may require updating later to reflect the revisions to the permit application that are related to the AE.

ADEQ is ready to issue the draft APP, which EPA and Cadmus should consider to avoid conflicts with the draft UIC permit. However, differences will be unavoidable in some aspects of the permit conditions, such as those related to surface operations and closure and financial assurance requirements.

Draft Permit Discussion:

Cadmus will use the Florence Copper permit as a template for the Gunnison Class III permit structure and format. The revised permit application will be reviewed when received in two to three weeks and relevant exhibits and figures will be referenced and/or placed in the draft permit as appendices. Nancy requested that the draft permit be completed and delivered to EPA in three weeks. The plan is to issue the draft permit six to seven weeks from today, but that will depend on the timely receipt of the Excelsior response and revised application.

Cadmus will review and ensure that the revised application is adequate and acceptable. Nancy will provide a permit number for the draft permit.

Nancy and Shari: Please add or change my summary of the discussion if I have omitted or mischaracterized any of the important points discussed during the call.

Thanks,

Jim

